

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

UNITED STATES OF AMERICA

v.

KEITH ALLEN PINKARD,

*Defendant.*

Case No. 1:25-MJ-286

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Benjamin Burnheimer, being first duly sworn, state as follows:

**BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have been in this position since September 2015. I received approximately 16 weeks of training at the FBI Academy in Quantico, Virginia. During that time, I received training on various topics including evidence collection, interviewing, legal procedure and process, source management, investigative technology, firearms and tactical training, and defensive tactics. I am currently assigned to the Washington Field Office, Northern Virginia Resident Agency, to a squad that investigates sexual exploitation of children, including such exploitation via the Internet and computers. Since joining the FBI, I have investigated federal criminal violations related to high technology or cybercrime, sexual exploitation of children, and child pornography. I have received training in the areas of child pornography, child exploitation, and human trafficking, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in multiple forms of media, including computer media and cellular and smartphone devices. I have participated in the execution of numerous federal search warrants conducted by the FBI and in the

seizure of computer systems and other types of digital evidence. In addition, I am certified as a Digital Evidence Extraction Technician (DEXT) within the FBI. As a DEXT, I am trained and authorized to conduct forensic examinations of digital evidence. This work includes the preservation and analysis of various forms of digital media, including cellular devices, smartphones, and computers. Since approximately April 2019, I have preserved and examined numerous items of digital evidence, most of which were related to investigations involving crimes against children.

2. As a federal agent, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer I am authorized to execute warrants issued under the authority of the United States.

3. This affidavit is submitted in support of a criminal complaint charging KEITH ALLEN PINKARD with attempted enticement of a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b).

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers, witnesses, and/or agencies. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to law enforcement concerning this investigation. Rather, I have set forth only the facts necessary to establish probable cause for the requested complaint.

#### **SUMMARY OF PROBABLE CAUSE**

5. An FBI special agent acting in an undercover capacity (hereinafter the “UC”), became a member of multiple groups on an online social media and messaging platform, referred to in this Affidavit as “Application A.”

6. Based on my training and experience and conversations I have had with other law enforcement officers, I know that Application A is a social media platform that caters to individuals with sexual fetishes, including BDSM,<sup>1</sup> and “taboo” interests, including sex with minors. I also know that individuals often use Application A to connect with like-minded people and/or to discuss child sexual abuse and trade child sexual abuse material (CSAM), among other things.

7. On or about May 1, 2025, Application A user “KeithP58” (later identified as KEITH ALLEN PINKARD) sent a private message to the UC with the subject, “older daddy dom interested.” The following is a portion of the chat between PINKARD and the UC that occurred on Application A:

PINKARD: Seeking a new playmate to join me for an ongoing fun adventure

UC: Ooo what kind of adventure? What are you into?

PINKARD: Hi there  
The adventure can be whatever we make of it:  
Tend to play dominant  
Love spansks and light restraints  
Very oral and love to please  
Love foreplay

PINKARD: You?  
What area are you located in?

8. In response, the UC indicated that they were into “young/incest taboo”<sup>2</sup> and asked PINKARD whether he had any experience. PINKARD continued the chat on Application A with the following:

PINKARD: Good afternoon  
Yes, I have played that many times.....

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<sup>1</sup> BDSM is common shorthand for “bondage, discipline, dominance, submission, and sadism.”

<sup>2</sup> Based on my training and experience and discussions I have had with other law enforcement officers, I know that young/incest taboo is often used online to convey an interest in sex with children.

Consensual and CNN

PINKARD: CNC<sup>3</sup>

PINKARD: Love when it is a recurring theme

PINKARD: Dad/stepdad – daughter  
Uncle – niece  
Coach – player  
Teacher – student  
Parents boss  
Babysitter  
Worker – kid home  
Delivery guy

UC: Mmm so mostly role play? Ever the real thing?

9. PINKARD responded, “Yes..... Once with a niece that was maybe 19 at the time” and “once when I was in highschool with a neighborhood girl that was like 6th grade but very developed[.]” PINKARD told the UC that he “started with that niece just kissing and felt her up when she was about 14.”

10. The following morning, PINKARD messaged the UC and stated they “should get together, share and relive [their] desires[.]” The UC suggested they switch to a different platform and PINKARD replied that his “only other comms are Kik, direct email or text.” They agreed to chat via text message and PINKARD provided his phone number ending in 4549.

11. On or about May 2, 2025, the UC sent a text message to PINKARD at the phone number ending in 4549. PINKARD replied, “I’m Keith[.]” The UC asked PINKARD to share more about his experience with his niece. PINKARD stated it was his girlfriend’s niece, who was “about 14” and he was in his late twenties. PINKARD stated the niece asked about French kissing and “wanted to try.” PINKARD told her it had to be their “secret” and they “kissed for a few minutes before everyone came home.” PINKARD described an instance a few weeks later where

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<sup>3</sup> CNC is shorthand for “consensual nonconsensual.”

he and “the niece” were in the back seat of a van coming back from a festival. During the drive, he “rubbed her neck and worked [his] way to cupping here [sic] breast, while rubbing her nipples she got such tittie hard-ons.” PINKARD then said he “pushed her shirt and teen bra up and started massaging and playing with her nipples.” PINKARD stated that he was in his “mid to late 20s” at the time.

12. The UC asked PINKARD if he had “ever gone younger,” and PINKARD responded, “Yes.....that neighbor girl but I was younger also” and “She was 11 or 12 and [he] was probably 17.”

13. The UC asked PINKARD if he has any interest in young now. He responded, “yes, I seem to take notice[.]” The following is a portion of the chats between PINKARD and the UC that occurred via the phone’s native messaging on May 2, 2025:

UC: So awesome. Any interest in young now?

PINKARD: Yes, I seem to take notice

UC: Same. It’s been hard to keep my feelings down tbh, I have a little girl and she’s been tempting me

PINKARD: How old?

UC: 9 [monkey emoji] [monkey emoji]

PINKARD: Oh wow...  
Yeah that’s tough

PINKARD: Pic?

UC: Slow to send pics but I will depending on how things go. Her and I started with some stuff a few months ago and she’s really into it...she wants more tbh

PINKARD: Mmmmmm  
Nice  
Maybe a nice grandpa guy is the answer

14. The UC told PINKARD that her purported daughter had expressed interest in men

and she (the UC) could only show her so much. In response, PINKARD asked the UC what type of stuff they have been doing. The UC stated that they had done a lot of “tongue stuff” and just started “fingering a few weeks ago and she loves it.” PINKARD responded, “I’d love to get together and watch.” The UC asked PINKARD if he had “ever had that young?” and PINKARD said “No” and his youngest was “11-12[.]” The UC then asked PINKARD if her purported daughter was too young for him. The following is a portion of the chats between PINKARD and the UC that occurred via the phone’s native messaging:

UC: That’s awesome though. Is mine too young for you?

PINKARD: No I think not.....  
Love to see you guys together  
That might make her more comfortable with me

UC: Yes could be. I think she’d be excited to meet the right person. What would you want to do?

PINKARD: Like to hug and kiss her ALL over...  
Rub her all over  
  
Let her explore me  
Does she touch and explore you?

15. The UC responded that she did, and told PINKARD that her daughter had been asking questions “about penises and how they work.” PINKARD replied, “Mmmmm NICE ....” and told the UC that she [the daughter] “should learn from some [sic] trusted before she gets approached by the wrong person.”

16. The UC asked where PINKARD lives. PINKARD told the UC that he lives in Arlington by Pentagon City. The UC stated that she is in Fairfax, to which PINKARD replied “not an issue at all.” PINKARD stated, “I LIKE where we are going..... What's your general availability?” The UC said, “Me too” and PINKARD added, “Actually a little precum in my crotch now[.]”

17. The UC and PINKARD continued to discuss schedules and availability. PINKARD indicated that he is usually available midday Monday through Wednesday, and Monday and Tuesday evenings, and he was “happy to travel or host....” When the UC asked PINKARD what he was thinking about, he responded, “Just the whole process, her taste, the feeling of her in my hands, her hands on me[.]”

18. PINKARD asked the UC for a picture of her daughter. The UC sent PINKARD a picture of her purported nine-year-old daughter<sup>4</sup>. The UC responded, “OMG!!! LOVE what I am seeing.” The following is a portion of the chats between PINKARD and the UC that occurred via the phone’s native messaging:

PINKARD: Looking AWESOME

PINKARD: Can’t wait to see you guys together

PINKARD: You will need to tell me her favorite things so I can get her a little something

UC: Well thank you :)

UC: I can certainly do that. She would loveee that. When would you like to plan this??

PINKARD: Excellent

I say the sooner the better....  
Tuesday?

PINKARD: I want her to be my SPECIAL lil girl and me to be her favorite guy

PINKARD: Same for you!!

19. The UC asked if the picture of PINKARD on his Application A profile is really him. PINKARD responded it was and said, “Feel free to show her.” The UC confirmed that after

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<sup>4</sup> The image did not depict a real child.

2PM on Tuesday should work for a meeting, and PINKARD said he “should be available around 200[.]”

20. PINKARD asked the UC if they are associated with law enforcement because “not a lot of people would understand or approve of our desires.....” And then before the UC replied, PINKARD asked “Do you want to host? Or me?” The UC replied that they are not a cop and asked if he was. PINKARD said, “Good to hear[.] No...I have NO ties to law enforcement.” PINKARD then asked the UC where they would like to meet. The UC asked PINKARD how he feels about meeting at a coffee shop near their house so they can meet and then walk back to the UC’s house, which is three minutes away. PINKARD replied, “Sounds like a good deal...Just send me the address..Looking forward[.]” PINKARD then said, “Good night [.] Sweet dreams[.] I’ll be dreaming about MY new girls!!”

21. The following day, on or about May 3, 2025, PINKARD initiated a chat with the UC via text message. He stated he had some questions for the UC and listed the following:

PINKARD: How often do you have sexual play time with her?

What do you call it and who initiates it?

When was the last time?

What do you call her body parts?

Has anyone else played with you and her together?

Did she see my pic and I hope you both like me?

Shortly after, in another message, PINKARD asked the following additional questions:

PINKARD: Does anyone else know, and I’m sure you have told her how important it is to not EVER say anything?

Does she understand what an orgasm is?

Have you ever orgasmed from playing with her or her playing with



her?

22. After the UC responded to PINKARD's message, PINKARD stated that he is "ready to commit to a regular thing, if you and she are[.]" PINKARD stated that he would "like to meet ,AT LEAST, once a week[.]" but his "schedule is just a little limited." PINKARD further stated, "I'm not that large so I'm sure we can work up to actual intercourse. Obviously if she I [sic] initiating , she must be getting pleasure." The chats continued, as shown below:

PINKARD: I think you two should start on Tuesday so I can see her reactions and then join in

UC: Once a week is a great idea. I like the idea of consistency.

PINKARD: I agree...plus give everyone something to look forward to

PINKARD: If she craves it more then we can see how we can do more.

PINKARD: Please know that I will treat her as my own precious baby girl

PINKARD: Any hard limits?

PINKARD: [sends picture of his face]

PINKARD: Show that and tell her I look forward to seeing you guys

23. The UC told PINKARD she would show her daughter the picture, and then explained the limits she had for her purported daughter. The UC also stated, "I do want to let you know I only date women, so this won't be about me. I really am looking for someone for her and for me to watch. Is that ok with you?" PINKARD responded, "Yes, I was thinking about you as well and maybe as an example.... Or as a threesome eventually....but I get it. She will most certainly be my desire and focus[.]" The following is a portion of the chats between PINKARD and the UC that occurred via the phone's native messaging:

UC: So given my limits..what are you thinking?

PINKARD: Absolutely

PINKARD: As long as everyone is happy I would ask that I be the exclusive male partner for her, it's a given that you two would still play

UC: Yes of course, I think that's safest for her! And I think one partner is more than sufficient

PINKARD: Agreed

PINKARD: I still think for the first date you guys should start and I will join or take over

24. The UC asked PINKARD what he would like to do with her daughter. PINKARD indicated that he "would like to sit and chat, present her with her gift, then have her lead me to her room or wherever. You are welcome if everyone is cool[.] Be nice if she were in PJ set[.] Or panties and a tshirt[.]" PINKARD then asked for "Couple more pics?" The UC sent a picture of her daughter<sup>5</sup> wearing panties and a tank top and asked PINKARD, "Like this?" The following is a portion of the chats between PINKARD and the UC that occurred via the phone's native messaging:

PINKARD: Mmmmmm  
HELL YEAH!!

PINKARD: Yep  
Got the lead

PINKARD: You may want to explain how a man cums...Are you ok with me cumming in or on her?

PINKARD: So fing hot

PINKARD: How did you explain who I was and what I was coming over for?

PINKARD: Has she tasted your pussy juices?

PINKARD: Being so young, does she orgasm, get wet?

PINKARD: Don't forget, I need to find out her favorite things. And the address where we are going to meet.

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<sup>5</sup> The image did not depict a real child.

25. The UC stated that their purported daughter knew they had been looking for the right man for this purpose and the daughter was very excited when the UC told her they had found someone interested. The UC stated the daughter thinks she has orgasmed but is not entirely sure. PINKARD stated, “I will hopefully clarify that and have her orgasm without doubt[.]” PINKARD then stated, “Damn I am so ready to get started[.]” In response to PINKARD’s earlier suggestion that the UC explain to her daughter “how a man cums” the UC told PINKARD “I will def explain how a man cums and what it looks like. The following chat ensues:

UC: Would you rather cum in or on?

PINKARD: Well eventually YES, ALL

Hope to expose her to pleasure in a lots of different ways

PINKARD: I mean, that’s the goal right?

26. PINKARD continued chatting with the UC and asked them if they had this type of experience growing up. The UC described a time with their uncle and said they were eleven at the time. PINKARD responded with the following:

PINKARD: Nice

PINKARD: Hopefully I can help fill (pun intended) that void

PINKARD: Have you ever fantasied about your sister’s kids?

PINKARD: I want [purported daughter] to feel she can come to me if she has any questions

27. The UC asked PINKARD when the last time was that he got to do anything. PINKARD stated, “it’s been a long time ....sometimes I will target teens on [Application A]<sup>6</sup> but with no luck[.] They are looking for sugar daddies or adonis's[.]” PINKARD stated, “Honestly I’m honored to have this opy [sic] Opportunity[.] I won’t let you down[.] I think the combo of ages

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<sup>6</sup> PINKARD used an abbreviation (the first three letters) for Application A.

will really be beneficial[.]”

28. The UC asked PINKARD if he ever had an experience like this. PINKARD described a time when he was a teen and he “target[ed] a elementary school girl . Just a couple of BJ encounters[.]” Shortly after, PINKARD told the UC, “That pic of your daughter is so cute[.] We are going to enjoy our time together[.]” The UC responded that PINKARD will “enjoy her” and the UC would talk to her (the daughter) about it the following day. PINKARD replied, “Yes I will enjoy her!! I’m REALLY looking forward to it, meeting you and enjoying her[.]”

29. The following day, on May 4, 2025, PINKARD initiated a chat with the UC via text message. The UC told PINKARD they were glad he liked the purported daughter’s pictures and “I will tell her tonight when we chat[.]” PINKARD replied, “Yes, look forward to hearing about her reactions[.]”

30. The UC asked PINKARD if he works. PINKARD told the UC that he is a project manager for a facility management contractor. PINKARD said he works three days in Virginia and two days in Pennsylvania. He also stated that his company rents him a full-time apartment in Pentagon City. PINKARD told the UC, “NOW, I know how to plan on spending some of that time.” PINKARD stated that his schedule gives him “total freedom while in DC” making him available for “those few evening and flexible for day visits[.]” PINKARD told the UC that, “as long as this works out, I’m not looking for anything else. My energy will be focused on her.”

31. PINKARD then confirmed again that the scheduled meeting time works, as shown below:

PINKARD: Clock is moving way too slow, can’t wait for Tuesday

UC: Omg us too. Gonna talk to her tonight. 2 still work on Tuesday?

PINKARD: Yes..200 will work

PINKARD: I will block off time on my calendar

32. On or about May 4, 2025, the UC stated that she [referring to the daughter] is ready for Tuesday but feels “nervous about what exactly to do . . .” PINKARD replied, “Mmmm EXCELLENT[.] Tell her I am excited also and am confident that we will have an enjoyable time[.]” The UC told PINKARD that it may be better to “just keep Tuesday about you guys.” PINKARD thanked the UC “for trusting me with such a precious cutie[.]” The following conversation ensued:

PINKARD: Do you think she has any specific questions or expectations?  
Or just general nerves?

UC: Just verbal nerves I think. She’s excited to see a penis and asked me about how it goes from hard to soft; how it feels and what comes out of it hahaha

UC: She’s so innocent

PINKARD: Mmmm ...nice.

I’ll be sure she has a chance to see and maybe taste.

I never script encounters but more go with the vibe of what is going on[.]

33. The UC asked PINKARD what he would like to do with her daughter so she can prepare her and ensure PINKARD and the UC are on the same page. PINKARD said, “Definitely some light foreplay to get her warmed up, absolutely enjoy some oral, see how she feels about the penis. Sort of laying the ground works for the future visits[.]” PINKARD told the UC he would not be able to sleep the next couple of nights—“I’ll be like a kid on the night before Christmas.”

34. PINKARD asked the UC about some of the daughter’s favorite things. The UC stated that her daughter likes the candy “sour patch kids” or anything Frozen-themed.

35. On May 5, 2025, PINKARD initiated a chat with the UC via text message. They

exchanged several messages and PINKARD told the UC he was “watching the clock and wishing it were moving quicker!!” Later, he said he was “Looking forward to being sure she is exposed to things properly[.]” He also said he would “be so happy when we get to actually start[.]” Then he asked the UC,

PINKARD: What is your plan??  
Will you be in the room?  
Will we leave the door open so you can sneak a peek?

You said she was uncomfortable with someone watching....

PINKARD stated, “I want it to be amazing for her[.]” The UC asked, “Anything I should share with her tonight?” and PINKARD replied, “That I’m very excited to meet her and been thinking about her ALL day!!” PINKARD said, “Can’t wait to see her in person and hold her[.]” The UC said he was “just gonna love her little body” and PINKARD replied he would “Hold it, caress it, taste it!!” Then he said, “And might I add.... Use it for her pleasure AND mine.” Several minutes later he said, “Let’s hope she finds pleasure from male parts and reactions as well.”

36. Based on my review of the chats, PINKARD never asked the UC for their full name or residential address.

*Identification of PINKARD and Meeting*

37. As stated above, PINKARD provided his telephone number to the UC. A search of commercial databases revealed an association between the phone number and PINKARD. A comparison of the photo PINKARD sent to the UC with a photo of PINKARD maintained by a law enforcement database revealed that both appear to depict the same person. Moreover, additional details provided to the UC by PINKARD, including that his first name is Keith, that he has a house in Pennsylvania, and that he was in sixties, are consistent with information about

PINKARD contained in law enforcement databases, commercial databases, and publicly-available sources.

38. On May 6, 2025, PINKARD initiated a chat with the UC via text message. He confirmed with the UC that he would meet the UC later that day at the previously discussed meeting location within the Eastern District of Virginia. PINKARD told the UC that he was wearing a pink, blue, and white, checkered shirt.

39. Using commercial databases, law enforcement personnel identified a red Ford F-150 with Pennsylvania license plates, associated with PINKARD. At the meeting location, at approximately 1:35PM, law enforcement officers observed PINKARD exit a red Ford pickup truck with Pennsylvania license plates and wearing a shirt that matched the description provided by PINKARD to the UC. PINKARD was taken into custody by law enforcement officers at the meeting location.

40. PINKARD provided verbal consent to search his vehicle. Prior to beginning the search of the vehicle, law enforcement personnel were able to see in plain view a gift bag on the front seat that appeared to contain, among other things, a Frozen-themed coloring book. Additionally, law enforcement personnel were able to see in plain view an Easter-themed basket on the rear floor that contained candy. Law enforcement personnel then conducted a search of the vehicle. The gift bag found on the front passenger seat of the vehicle contained, in addition to the Frozen-themed coloring book, two packs of sour patch kids candy and colored pencils.

41. PINKARD was subsequently interviewed by two FBI special agents. He was advised of his *Miranda* Rights, which he acknowledged and waived. The interview was recorded. During the interview, PINKARD confirmed that he had communicated on Application A, and subsequently via text message, with an individual who said they had a 9-year-old daughter.

Additionally, PINKARD stated the following:

- PINKARD is known as a daddy/dom on Application A;
- PINKARD's idea was to "try and play the hero" and provide information gained from the UC to the police;
- PINKARD told the UC he wanted to bring the daughter a little gift;
- PINKARD denied talking about him having sexual intercourse with the daughter;
- PINKARD wanted to "get the girl out of there";
- PINKARD's intention was to get a physical address, get a last name, and submit it to Crime Solvers;
- PINKARD alleged that he submitted a report to Crime Solvers, but never included her picture in the tip, did not know if he included her phone number, and did not follow up with the tip, with the goal of remaining anonymous;
- PINKARD did not know how anonymous he would remain if he met the UC in person, kidnapped the kid, and brought her to the police department;
- PINKARD understood that, if he brought the daughter in, he would fill out a report that would include his name;
- PINKARD's plan was to meet the UC, possibly meet her daughter, but not follow through with his plans to have sex with the daughter;
- PINKARD's chats were all talk and he was role playing the whole time;
- PINKARD never called Fairfax Police, Alexandria Police, Arlington Police, or the FBI, even after having obtained the UC's phone number and details about the meet;
- PINKARD's plan was, if he could get the daughter by herself, to get her out;
- PINKARD never at any time contacted the police about the UC or meeting plans;



- PINKARD probably should have called the police;
- In the chats, PINKARD discussed plans to meet with a woman who has a nine-year old, discussed how he was going to abuse that child, purchased “gifts” for that child, met up with a woman with the intent of going back to her apartment, but stated did not have a logical reason for the interviewing Agents to believe why he would not have followed through with his planned actions;
- PINKARD thought that, if he could get her [the daughter] out, he would bring her to the Alexandria City Police Department;
- PINKARD thought he would be “pretty much screwed” if, had the UC been all talk, he met with the UC and her daughter, grabbed the daughter and took her to the police department;
- PINKARD was previously involved with a church in Herndon, Virginia and had previously taken mission trips with high school kids;
- PINKARD had the chats on his phone;
- PINKARD denied telling the UC any fetishes that involved kids;
- PINKARD told the UC different scenarios, but that it was all “just role-playing” ;
- PINKARD did not intend to go past “gleaning information”;
- PINKARD intended to provide the gifts he brought to the meeting location to the kid;
- PINKARD indicated that the UC made it clear that it was not about the mom as she was only interested in other women, but it was about the daughter;
- PINKARD came there (to the meeting place) to get the daughter out, either physically, or leave and call 911 once he obtained a physical address;
- PINKARD confirmed that he discussed cumming inside of the UC’s daughter;
- PINKARD had a week and a half conversation about having sex with the UC’s daughter;

- PINKARD was trying to stay anonymous to protect his marriage;
- Although PINKARD provided his real name, his real phone number, planned to kidnap the UC's daughter, bring her to the police, and fill out a police report, he engaged in the chats because he was trying to stay anonymous;
- PINKARD's intent was to kidnap the kid to bring her to safety; and
- PINKARD understood that either of his planned courses of action were illegal.

### CONCLUSION

42. Based upon the above information, I respectfully submit there is probable cause to believe that PINKARD attempted to entice a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b) within the Eastern District of Virginia. I therefore respectfully request that the Court issue the attached complaint charging PINKARD with that offense.

Respectfully submitted,



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Benjamin Burnheimer, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to in accordance with Fed. R. Crim. P. 4.1 by telephone on  
May 7, 2025:

**Lindsey R Vaala** Digitally signed by Lindsey R Vaala  
Date: 2025.05.07 13:16:59 -04'00'

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The Honorable Lindsey R. Vaala  
United States Magistrate Judge  
Alexandria, Virginia